

# Thames Tideway Tunnel Relevant Representation

## Development Consent Order (DCO)

### **Implementation**

The implementation of the DCO will be undertaken by an Infrastructure Provider, different to Thames Water, who may not adhere to the same principles and visions/aspirations which are included in non-statutory documents separate from the DCO. Amongst those documents are the Code of Construction Practice and the Design Principles.

### **Mitigation measures**

Most of the mitigation measures are included in the Code of Construction Practice (CoCP) and Design Principles (DP). This does not ensure their implementation. All mitigation measures must be included in the DCO.

As part of site development there are issues which will require careful monitoring and the implementation of mitigation measures. These include cumulative impacts to the transport network; air quality; land contamination; ecology (loss and disruption of habitat); the settlement of the river wall during construction and odour during operation. In most cases, mitigation measures are left to the future design options included in the contactors' methodologies. This increases uncertainty about their implementation. It could also lead to increasing costs for the Council once construction starts with the discharging the requirements and enforcing the CoCP. The Council wish to ensure that the planned maintenance work to the vents and drop shaft head houses, every two to three months, will not be intrusive and should be undertaken only during daytime hours.

### **Traffic regulation**

Within the DCO, the powers under Article 18 (Traffic Regulation) of the work provisions and the extent of the no waiting restrictions proposed under Schedule 10 are considered to be excessive.

### **Quality of public realm**

The importance of the engineering part of the project is undisputed. However, the Council would like assurance that the quality of the public realm created will not be affected if the costs of the engineering project escalate.

### **Cremorne Wharf Site**

The construction of the tunnel on Cremorne Wharf should not prejudice the future redevelopment of the site.

The design approach is generally supported although the Council has the following concerns:

- Potential changes affecting the nearby Lots Road pumping station, where the threat of settlement on the grade II listed structure is an issue - this can only be addressed through careful and responsive monitoring; and the sensitivity with which new plant equipment is placed in and around the listed building.
- The site parameter plans for approval allow for positioning of new 8.0m ventilation columns within and immediately adjacent to the pumping station. The height of column is considered excessive and the possible location harmful to the setting of the listed building. The plan fails to confirm the location and size of the new electrical switch pillar. Any works undertaken should be to a high quality and preserve, if not enhance, the listed building.
- The proposals do not take the opportunity to advance the widely recognised ambition for providing the Thames Path apart from leaving a gap. Given the disruption involved it is disappointing that a more comprehensive and positive proposal for reinstatement could not have been advanced.

The Council objects to the loss of five on-street parking bays on Lots Road, in particular the two visitors bays on the south east side of the street, as they could be retained and used to provide additional parking for residents.

The ecological enhancements of the river wall post development are supported.

### **Chelsea Embankment Site**

The design approach is generally supported. The concept of a high quality public space that celebrates the axial alignment of the neighbouring grade 1 listed Royal Hospital and its riverside setting is welcome. However, the outstanding concerns are:

- The parameter plans for approval allow for columns of up to 8.0m in height, which is excessively tall and visually prominent.
- The plans allow the location of the new columns and other kiosks in positions that would disrupt or infringe upon the very axial view the scheme sets out to celebrate.
- The designs include the permanent disruption of the distinctive boundary wall of Ranelagh Gardens, which is harmful to its appearance and unnecessary given an existing entrance near-by.
- The designs could facilitate off-street parking and coach drop-off on the new open space, requiring the potential provision of signage,

bollards and other deterrents that would clutter and detract from its appearance.

- The quality of scheme is not assured, it fails to deliver high quality paving adjacent to the Grade II listed Bull Ring Gates, and does not cover any future maintenance regime.

Pedestrians on Chelsea Embankment would be affected with walking times increasing as a result of the diversion and the need to cross the busy Embankment carriageway during construction.